

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-18075-jkf
Juanita Rowser and Kenneth L Rowser	: Chapter 13
Debtors	:
	:
Deutsche Bank National Trust Company, as	:
Indenture Trustee, on behalf of the holders of	:
the Accredited Mortgage Loan Trust 2006-2	:
Asset Backed Notes c/o Select Portfolio	:
Servicing, Inc.	:
Movant	:
vs.	:
Juanita Rowser and Kenneth L Rowser	:
Debtors/Respondents	:
and	:
Scott Waterman, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

Movant, Deutsche Bank National Trust Company, as Indenture Trustee, on behalf of the holders of the Accredited Mortgage Loan Trust 2006-2 Asset Backed Notes c/o Select Portfolio Servicing, Inc. ("Movant"), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtors, Juanita Rowser and Kenneth L Rowser ("Debtors"), as follows:

1. As of the bankruptcy filing date of December 6, 2018, Movant holds a secured Claim against the Debtor's property located at 4383 Garfield Lane, Trevose a/k/a Feasterville Trevose, PA 19053.
2. On December 27, 2018 Movant filed a Proof of Claim citing a secured claim in the amount of \$168,516.08, with pre-petition arrears in the amount of \$39,611.46.
3. The Plan currently proposes payment to Movant in the amount of \$33,268.00 for pre-petition arrears.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtors is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtors' Chapter 13 Plan.

Respectfully submitted,

Dated: 01/11/2019

s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521/Fax 215-855-9121  
debersole@hoflawgroup.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 18-18075-jkf
Juanita Rowser and Kenneth L Rowser	: Chapter 13
Debtors	:
	:
Deutsche Bank National Trust Company, as	:
Indenture Trustee, on behalf of the holders of	:
the Accredited Mortgage Loan Trust 2006-2	:
Asset Backed Notes c/o Select Portfolio	:
Servicing, Inc.	:
Movant	:
vs.	:
Juanita Rowser and Kenneth L Rowser	:
Debtors/Respondents	:
and	:
Scott Waterman, Esquire	:
Trustee/Respondent	:

**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for Deutsche Bank National Trust Company, as Indenture Trustee, on behalf of the holders of the Accredited Mortgage Loan Trust 2006-2 Asset Backed Notes c/o Select Portfolio Servicing, Inc. ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on **01/11/2019**:

Brad J. Sadek, Esquire  
Via ECF  
*Attorney for Debtors*

Scott Waterman, Esquire  
Via ECF  
*Trustee*

Juanita Rowser  
Kenneth L Rowser  
4383 Garfield Lane  
Feasterville Trevose, PA 19053  
Via First Class Mail  
*Debtors*

Date: 01/11/2019

Respectfully Submitted,  
s/Danielle Boyle-Ebersole, Esquire  
Danielle Boyle-Ebersole, Esquire  
Attorney I.D. # 81747  
Hladik, Onorato & Federman, LLP  
298 Wissahickon Avenue  
North Wales, PA 19454  
Phone 215-855-9521/Fax 215-855-9121  
debersole@hoflawgroup.com